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16 *Attorneys for Defendant CoreCivic, Inc.*

17  
18 **UNITED STATES DISTRICT COURT**  
19 **DISTRICT OF NEVADA**

20 Kathleen Bliss, on behalf of herself, the  
Proposed Nationwide Rule 23 Class, and the  
21 Proposed Nevada Subclass,

22 Plaintiff,

23 v.

24 CoreCivic, Inc.,

Defendant.

NO. 2:18-cv-01280-JAD-EJY

**DEFENDANT'S UNOPPOSED  
MOTION FOR EXTENSION OF  
DEADLINE FOR RESPONSE TO  
PLAINTIFF'S MOTION TO COMPEL  
DEFENDANT'S RESPONSES TO  
INTERROGATORIES AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS  
(Dkt. 187)**

**(EXPEDITED CONSIDERATION  
REQUESTED)**

26  
27 Defendant CoreCivic respectfully requests a one-week extension of the deadline to file its  
28 response to Plaintiff's Motion to Compel Defendant's Responses to Interrogatories and Requests

for Production of Documents (Dkt. 187). This request is necessary because Defendant and defense counsel are currently engaged in (1) analysis and preparation of deliverables to aid both parties in finalizing search terms, custodians, and amended protocols to meet the April 29, 2022 deadline for agreement as to the second-stage ESI collection/production process; and (2) ongoing preparation of CoreCivic's 30(b)(6) deponent to testify regarding the 47 facilities at issue at the 30(b)(6) deposition set for April 25, 2022. This is the first requested extension of the deadline for Defendant's response to Plaintiff's Motion. Plaintiff does not object to the requested extension, and it will not impact any other case deadlines, given that there is no trial date set, and Plaintiff's deadline for disclosing class certification experts is not until September 2022. Accordingly, Defendant requests that the Court extend the deadline from April 22, 2022 to April 29, 2022.

DATED this 20th day of April, 2022.

STRUCK LOVE BOJANOWSKI & ACEDO, PLC

By /s/ Anne M. Orcutt

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**IT IS SO ORDERED.**

  
**U.S. MAGISTRATE JUDGE**

**Dated: April 21, 2022**

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